

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND UPS OVERNIGHT MAIL

November 6, 2014

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 630
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Daniels:

The Plaintiffs' Executive Committees write to respectfully request an extension of the deadline for Plaintiffs' Opposition to the Renewed Motion to Dismiss of the Kingdom of Saudi Arabia and Saudi High Commission for Relief of Bosnia & Herzegovina (SHC), from November 14, 2014 to December 30, 2014. This extension is needed to allow time for the Department of Justice to complete its review of evidence plaintiffs intend to submit in support of their Opposition. The Kingdom and SHC consent to this request.

As Your Honor will recall, Zacarias Moussaoui, who in April 2005 pleaded guilty to six charges against him relating to participation in the September 11th conspiracy, wrote to Your Honor in May 2014, expressing his desire to meet with attorneys for the 9/11 plaintiffs and to provide testimony in support of their claims. A copy of that letter is attached. Plaintiffs received a copy of that letter and, in response, wrote to the Federal Bureau of Prisons in June, to request authorization to interview Moussaoui at the ADMAX Prison in Florence, Colorado, where Moussaoui is presently incarcerated.

Moussaoui is subject to special administrative measures imposed pursuant to 28 C.F.R. §501.3, and as a result plaintiffs' request for access to Moussaoui required coordination between Main Justice, the Federal Bureau of Investigation, and the Bureau of Prisons. The Department of Justice and other involved agencies approved plaintiffs' request for access to Moussaoui in late September, and advised that the earliest possible date for the visitation would be during the week of October 20, 2014.

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Attorneys for plaintiffs travelled to Florence, Colorado and met with Moussaoui on October 20 and 21, 2014. During those visits, Moussaoui provided testimony under oath, which was transcribed by a court reporter. Immediately upon receipt of the transcripts of Moussaoui's sworn testimony, plaintiffs forwarded those transcripts to Assistant United States Attorney Neil Hammerstrom of the Eastern District of Virginia, who is the point person for the administration of the special administrative measures applicable to Moussaoui, seeking confirmation that the Department of Justice did not object to the filing of the Moussaoui transcripts as part of the record in support of plaintiffs' Opposition to the Renewed Motion to Dismiss of the Kingdom and SHC. Although plaintiffs had understood that the review process could be completed in advance of the deadline for filing plaintiffs' Opposition, Mr. Hammerstrom advised earlier this week that the FBI's review of the testimony remained ongoing, and that additional layers of review would be required within Main Justice following completion of the FBI's review. Mr. Hammerstrom indicated that he could not provide a specific timetable for the completion of that review, and suggested that plaintiffs request an extension of the present court deadline, to allow time for the completion of the internal review of the Moussaoui transcripts by the FBI and Department of Justice.

Plaintiffs believe that Moussaoui's sworn testimony is not only relevant, but critical to their Opposition to the Defendants' Renewed Motion to Dismiss. Given the extraordinary nature of the process that is ongoing within the federal government concerning the review of this evidence, and the relatively modest additional time needed by the government to complete its review of the transcripts, plaintiffs respectfully request that the Court endorse their requested extension of the deadline for filing their Opposition to the Renewed Motion to Dismiss of the Kingdom and SHC, from November 14, 2014 to December 30, 2014.

Plaintiffs would further propose that the deadline for the Reply of the Kingdom and SHC in support of their Renewed Motion to Dismiss be extended to January 30, 2015. Finally, plaintiffs would also propose that the deadline for the Kingdom's and SHC's Opposition(s) to Plaintiffs' Motion to Amend be extended to December 30, 2014, and that the deadline for Plaintiffs' Reply in Support of their Motion to Amend be reset to January 30, 2015.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,



Sean P. Carter

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

SPC

cc: The Honorable Frank Maas (via Overnight UPS Mail)
Defendants' Counsel of Record (via ECF and Email)
Neil Hammerstrom, Esquire (via Email)

In The Land of ALLAH
The Slave of ALLAH, Zacarias Moussawi
so called 9/11 Hijacker.

George B. Daniel
U.S. District Judge.

Objed. Usama Bin Laden co conspirators
on the 9/11 Punishment Strike on
NY & America.

I, used to received in Alexandria by the
Marshall the summons relating to my
indictment in a civil suit against Usama
Bin Laden, Al Qaeda, me and others.

Since I am in ADX the BOP refuse to give
any info relating to this 9/11 case.

I want to meet you and testify about the
involvement of the Soeadi Bin Laden group
& family, Hafsa & and Bandar and Turki
of SACD and Khalid Harfouz and General
Ged in facilitating, financing 9/11 operation
and previous operation (East Africa).

The Slave of ALLAH
Zacarias Moussawi

P.S. As a defendant in a case brought by
the so-called victim family I want to
to meet the Attorney of victim family.

